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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ZYLBERBERG FEIN LLC.

Plaintiff,

-against-

THE REPUBLIC OF ARGENTINA.

Defendant.

07 Civ. 11496 (TPG)

NOTICE OF MOTION

PLEASE TAKE NOTICE THAT upon the annexed the declarations of Plaintiff

Zylberberg Fein LLC's legal representative, Paolo Francesco Calmetta, dated March 31, 2008, with an annexed exhibit; and Regina Alter, dated April 29, 2008, with annexed exhibits; the Statement of Material Facts Pursuant to Local Rule 56.1; the accompanying Memorandum of Law; and the pleadings and all prior proceedings had herein, the undersigned will move this Court before the Honorable Thomas P. Griesa, United States District Judge, at the United States Courthouse, 500 Pearl Street, New York, New York, at such time as the Court directs, for an Order, pursuant to Rule 56 of the Federal Rules of Civil Procedure, granting Plaintiff summary judgment as against defendant the Republic of Argentina, to strike defendant's discovery requests, and for such other relief as the Court deems just and proper.

Dated: New York, New York
April 29, 2008

DREIER LLP

By: 

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